

REMARKS

Claims 1-7 are pending and under consideration. Claim 1 is amended herein. Support for the amendment to claim 1 may be found at page 5, lines 2-7 of the specification, and in the claims as filed originally. Further reconsideration is requested based on the foregoing amendment and the following remarks.

Interview Summary

The Applicants submit the following summary of the telephone interview that took place October 17, 2006 between the undersigned representative of the Applicants and the Examiner.

Telephone Conference:

The Applicants thank the Examiner for the many courtesies extended to the undersigned representative of the Applicants during the telephone interview that took place October 17, 2006.

Among the issues discussed during that interview were the patentability of the claims over the cited references, and particularly U.S. Patent No. 5,581,682 to Anderson et al.

Response to Arguments:

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive. The final Office Action asserts in section 8, at page 4 that:

To the extent that applicant is arguing that the references applied in the rejection fail to use the same names for certain elements as the names used by applicant, the argument is irrelevant, as it is noted that the disclosure in a reference must show the claimed elements arranged in the same order as in the claims, but need not be in the identical words as used in the claims in order to be anticipatory. See *In re Bond*, 15 USPQ2d 1566 (Fed. Cir. 1990).

The Applicants agree that, in order to anticipate the claims, Anderson would need to show the claimed elements arranged in the same order as they are recited in the claims. The Applicants are not simply arguing that U.S. Patent No. 5,581,682 to Anderson et al., (hereinafter "Anderson") fails to use the same *names* for certain elements as the names used by Applicants. The Applicants, rather, are arguing that Anderson does not show the claimed elements arranged in the same order as they are recited in the claims at *all*, regardless of whether Anderson called them by the same names or not. Therefore, the extent of our arguments was not simply that Anderson fails to use the same names for certain elements as the names used by applicant, but

rather that Anderson doesn't show the claimed elements arranged in the same order of the claims at all.

In sections 9, 10, and 11, at page 5 the final Office Action refers to claims 1-5 of Anderson as showing the claimed elements arranged in the same order of the claims. The Applicants have reviewed claims 1-5 of Anderson carefully, however, and must continue to insist that they neither show an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed."

Anderson, rather, is about overlaying objects representing an annotation or redaction on a final form document to be merged in the same data stream as the final form document, as described at column 2, lines 25-28. Anderson does not describe how the overlays are applied at all, let alone an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed." Claim 1 of Anderson, for example, recites:

1. A method for storing documents and information associated with said documents, said method comprising the steps of:
converting a document to a document data stream, said document data stream comprised of document data and a plurality of structured fields;
converting information associated with said document to an information data stream;
combining said document data stream with said information data stream to form a combined data stream, leaving said document data in said combined data stream unchanged;
modifying at least one of said structured fields in said combined data stream by adding an include structure to indicate that said information data stream has been included in said combined data stream; and
storing said combined data stream.

Claim 1 may thus be seen to relate to a method for storing documents and information associated with said documents by modifying at least one of said structured fields in said combined data stream by adding an include structure to indicate that said information data stream has been included in said combined data stream. No structure analogous to an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-

disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed," appears in claim 1 of Anderson, whether literally or synonymously, at all.

Claim 2 of Anderson, similarly, recites:

2. A method as in claim 1 wherein a first of said structured fields is associated with a first portion of said information data stream, and said first structured field indicates whether said first portion of said information data stream is an annotation of said document data stream or a redaction of said document data stream.

Claim 2 of Anderson may thus also be seen to relate to the method for storing documents and information associated with said documents of claim 1. No structure analogous to an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed," appears in claim 2 of Anderson, whether literally or synonymously, at all.

Claim 3 of Anderson, similarly, recites:

3. A method as in claim 1 wherein:
a first group of said plurality of structured fields comprises a plurality of "begin flags", each of said flags indicating the beginning of a portion of said document data stream corresponding to the beginning of a portion of said document;
a second group of said plurality of said structured fields comprises a plurality of "end flags", each of said end flags indicating the end of a portion of said document data stream corresponding to the end of a portion of said document;
a third group of said plurality of structured fields being "indicator flags", each of said indicator flags being associated with one of said beginning flags and one of said end flags, said indicator flags indicating specific conditions; and
said modification of at least one of said structured fields comprising modifying a first of said indicator flags, said first indicator flag being associated with a first of said beginning flags and a first of said end flags, said modified indicator flags indicating that a first portion of said information data stream is to be associated with said portion of said document data stream corresponding to said first beginning flag and said first end flag.

Claim 3 of Anderson may thus also be seen to relate to the method for storing documents and information associated with said documents of claim 1. No structure analogous to an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-

disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed," appears in claim 3 of Anderson, whether literally or synonymously, at all.

Claim 4 of Anderson, similarly, recites:

4. A method as defined in claim 3 wherein said modified first indicator flag additionally indicates a security level of said first portion of said information data stream.

Claim 4 of Anderson may thus also be seen to relate to the method for storing documents and information associated with said documents of claim 1. No structure analogous to an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed," appears in claim 4 of Anderson, whether literally or synonymously, at all.

Claim 5 of Anderson, similarly, recites:

5. A method as defined in claim 3 wherein said modified indicator flags additionally indicate the location of said associated information within said first portion of said information data stream.

Claim 5 of Anderson may thus also be seen to relate to the method for storing documents and information associated with said documents of claim 1. No structure analogous to an "auxiliary storage unit storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason," "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," or "replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed," appears in claim 5 of Anderson, whether literally or synonymously, at all.

The Applicants thus reiterate their request for some showing as to where in Anderson elements analogous to those of the claimed invention might appear. In the alternative, the Applicants request respectfully that the rejections of claims 1-6 as anticipated by Anderson be withdrawn. Further reconsideration is thus requested.

Rejection under 35 U.S.C. § 102:

Claims 1-7 were rejected under 35 U.S.C. § 102(b) as anticipated by Anderson. The rejection is traversed.

The second clauses of claims 1, 3, and 5 recite substantially:

Storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason.

Anderson neither teaches, discloses, nor suggests "storing a dictionary which contains said at least one character string of non-disclosure in association with at least one corresponding reason," as recited in claims 1, 3, and 5. Anderson, rather, mentions no dictionary at all.

The third clause of claim 1 recites:

Embedding a tag of non-disclosure and the reason of non-disclosure corresponding to the character string in the XML formatted document according to said dictionary.

Anderson neither teaches, discloses, nor suggests "embedding a tag of non-disclosure and the reason of non-disclosure corresponding to the character string in the XML formatted document according to said dictionary," as recited in claim 1. Anderson, rather, mentions no "tag of non-disclosure," "reason of non-disclosure corresponding to the character string," or "XML formatted document" at all.

The third clauses of claims 3 and 5 recite substantially:

Embedding a tag and the reason of non-disclosure corresponding to the character string in the document.

Anderson neither teaches, discloses, nor suggests "embedding a tag and the reason of non-disclosure corresponding to the character string in the document," as recited in claims 3 and 5, either. In Anderson, rather, final-form documents are annotated or redacted *without* compromising the integrity of the original document. In particular, as described in the Abstract:

More particularly, this method allows final-form documents containing objects such as texts, graphics and images to be annotated or redacted by other objects carried in the same data stream without compromising the integrity of the original document.

Since Anderson wants to annotate or redact final-form documents without compromising the integrity of the original document, Anderson is not "embedding a tag and the reason of non-disclosure corresponding to the character string in the document" as recited in claims 3 and 5.

Anderson, furthermore, *maintains* the document's integrity. In particular, as described at column 2, lines 20-24:

The present invention embodies a method to store and retrieve final form documents which not only maintains the document's integrity but also overcomes the difficulties and inconvenience encountered in using an editor or merging and overlaying two files using links to an external file.

Since Anderson maintains the document's integrity, Anderson is not "embedding a tag and the reason of non-disclosure corresponding to the character string in the document" as recited in claims 3 and 5.

Furthermore, in Anderson, the contents of the original, underlying document as archived is *not* changed. In particular, as described at column 2, lines 42-47:

With both annotation and redaction, the contents of the original, underlying document as archived is not changed. However, a reviewer may see either the original document or the document with the annotations or redacted sections included.

Since, in Anderson, the contents of the original, underlying document as archived is not changed, Anderson is not "embedding a tag and the reason of non-disclosure corresponding to the character string in the document" as recited in claims 3 and 5.

Anderson, furthermore, only wants to allow annotation of final form objects *without* changing the contents. In particular, as described at column 2, lines 65, 66, and 67:

This invention uses the overlay function but has added a "conditional processing" structure to allow annotation of final form objects without changing the contents.

Since Anderson only wants to allow annotation of final form objects without changing the contents, Anderson is not "embedding a tag and the reason of non-disclosure corresponding to the character string in the document" as recited in claims 3 and 5.

Finally, Anderson, uses a forms *overlay* structure to store the data. In particular, as described at column 5, lines 44 and 45:

The method of the invention uses the forms overlay structures in order to store the data.

Since Anderson uses a forms overlay structures to store the data, Anderson is not "embedding a tag and the reason of non-disclosure corresponding to the character string in the document" as recited in claims 3 and 5.

The fourth clauses of claims 1, 3, and 5 recite substantially:

Replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed.

Anderson neither teaches, discloses, nor suggests “replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed,” as recited in claims 1, 3, and 5, either. Anderson, rather, positions *overlays* on the page based on *coordinate* data contained in the overlay reference. In particular, as described at column 3, lines 47-55:

With the current final form overlays, each annotation is stored as a separate data object in a library which is referenced from within the final form documents. When the final form document is presented, the referenced object is retrieved and merged with the specific data page. Overlays are then positioned on the page based on coordinate data contained in the overlay reference.

Since Anderson positions overlays on the page based on coordinate data contained in the overlay reference, Anderson is not “replacing the character string to which the tag of non-disclosure is given to a meaningless character string, when the document is accessed” as recited in claims 1, 3, and 5. Claims 1, 3, and 5 are thus submitted to be allowable. Withdrawal of the rejection of claims 1, 3, and 5 is earnestly solicited.

Claims 2, 4, and 6 depend from claims 1, 3, and 5, respectively, and add further distinguishing elements. The last clauses of claims 2, 4, and 6, for example, recite:

Replacing the retrieved tag of non-disclosure with the tag for compulsory disclosure.

Anderson describes no *compulsory* disclosure at all, let alone “replacing the retrieved tag of non-disclosure with the tag for compulsory disclosure,” as recited in claims 2, 4, and 6. Claims 2, 4, and 6 are thus also submitted to be allowable. Withdrawal of the rejection of claims 2, 4, and 6 is earnestly solicited.

Claim 7:

Claim 7 recites:

Replacing the character string of non-disclosure with a meaningless character string according to said reason, when there is said character string of non-disclosure in said dictionary.

Anderson neither teaches, discloses, nor suggests “replacing the character string of non-disclosure with a meaningless character string according to said reason, when there is said character string of non-disclosure in said dictionary,” as discussed above with respect to the rejection of claim 1. Claim 7 is thus submitted to be allowable for at least those reasons

discussed above with respect to the rejection of claim 1. Withdrawal of the rejection of claim 7 is earnestly solicited.

Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 1-7 are allowable over the cited references. There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

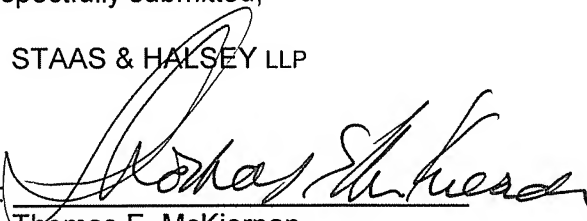
If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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